

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF JESS KHAN

DECLARATION OF JESS KHAN

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

DECLARATION OF JESS KHAN

I, Jess Khan, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and I make this declaration based on my personal knowledge.

2. I live in Minneapolis, Minnesota with my two children.

3. My child J.K., is transgender. He was assigned female sex at birth but his gender identity is male.

4. At age 9, J.K. told me that he was non-binary. A year and a half later, around age 10 and a half, J.K. told me that he was transgender. J.K. experiences gender dysphoria because of the incongruence between his sex assigned at birth and his gender identity. In hindsight, there were always signs, as J.K. has always been interested in traditionally masculine clothing and activities. He has also tended to have more male friends than female.

5. We have been fortunate to find a medical practitioner who has experience with gender dysphoria in youth. J.K. has been working with his medical provider for two and a half years. In addition to the medical practitioner, J.K. also has a therapist and psychiatrist. All providers are highly experienced with gender-affirming medical care.

6. My son expressed severe gender dysphoria as a result of the physical changes that are part of female puberty, including developing breasts and menstruating. Unfortunately, since my son had already begun female puberty, he was not eligible for puberty blocking medication. This significantly triggered his gender-dysphoria, causing anxiety and leading to self-harm and suicidal ideation because he is not able to present as the male person that he knows he is. J.K. has also been bullied for being transgender which also causes anxiety.

1 7. Fortunately, J.K. was able to begin period suppression hormones. Receiving period
2 suppression hormones has been key to ensuring my son's emotional, mental, and physical
3 health. J.K. was thrilled when he began this medication. I also noticed a significant
4 improvement in his mental wellbeing once he started taking these hormones. J.K. has never
5 expressed regret about taking these hormones.

6 8. After years of medical assessment, J.K.'s providers determined that it was possible
7 for him to start taking testosterone. He is very excited about beginning this treatment and is
8 greatly looking forward to being able to present as more masculine to the world.

9 9. I understand that the President of the United States has issued an Executive Order
10 affecting and preventing gender affirming care for people under age 19. J.K. is aware of the
11 Executive Order, and it makes him very afraid.

12 10. J.K. has asked me about what our plan is should the Executive Order prohibit his
13 access to gender-affirming care. Unfortunately, as a single mother of two children, I do not
14 have the mobility to move out of the country to ensure his access to gender-affirming care.
15 Should J.K. no longer be able to access gender-affirming care, he has said that he will self-
16 harm and attempt suicide. J.K. has been hospitalized in the past for suicide attempts and self-
17 harm, much of which is related to his gender dysphoria.

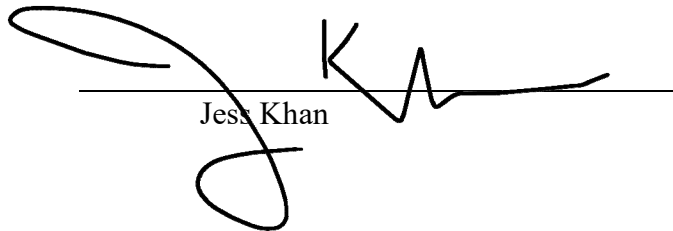
18 11. It saddens me and angers me that the Executive Order unfairly attacks my son and
19 other trans children. He should be able to access the gender-affirming medical care that allows
20 him to live in a body that matches his gender identity without discrimination.

21 12. I have decided to use my son's initials in this declaration to protect my son's
22 privacy and to protect him from acts of hatred or violence.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 DATED this 4th day of February 2025, in Hennepin County, Minnesota.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24



Handwritten signature of Jess Khan, consisting of a large loop followed by a series of sharp, angular strokes, positioned above a horizontal line.

Jess Khan